

BETSY COMBIER  
315 East 65<sup>th</sup> Street, Apt. 4C  
New York, N.Y. 10065  
917-596-1762  
Betsy.combier@gmail.com

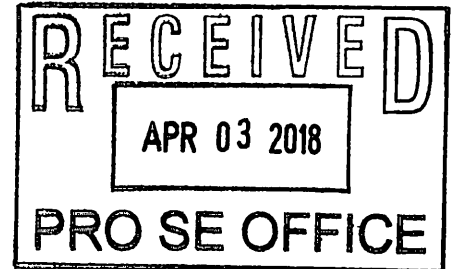
~~FEDEX~~  
VIA PRIORITY MAIL

March 30, 2018

Hon. Margo K. Brodie  
United States Federal Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, N.Y. 11201

United States Federal Court  
Eastern District of New York  
Pro Se Desk  
225 Cadman Plaza East  
Brooklyn, N.Y. 11201

Lucio Celli  
2743 Seymour Avenue  
Bronx, N.Y. 10469



RE: Combier v. Portelos, et. al.  
Docket No.: 1:17-CV-02239

Dear Judge Brodie,

Yesterday, 11 separate documents were submitted to you and docketed (#88-#99) in the matter captioned above.

It is clear that Defendant Celli's intent is to spread so many lies about me and my husband that something may "stick" simply because I cannot, or do not, answer him/his false claims fast enough. His papers serve no legitimate legal purpose and he is using the cover of the Court case to further his nefarious motive to defame me.

His actions are deleterious to the principles upon which this Court was set up, namely to honor due process rights and justice.

As I have no briefing schedule for my providing answers to his documents, I submit here the Answer to his filings:

- 1) I categorically deny any of his claims, made in the 11 documents submitted and docketed yesterday as well as submitted and docketed in this matter since the


inception of this matter, except that in good faith and as a non-attorney volunteer I helped Lucio Celli by editing his papers.

- 2) I oppose a mental examination pursuant to FRCP 35, as unsupported by any evidence, irrelevant to these proceedings, and without basis in fact or law.
- 3) I did not kill my mother or harass my sister or her children.
- 4) There are no lies in my Affidavit.
- 5) I never colluded with Steve Morelli or Jonathan Tand or anyone to steal money from Lucio Celli or anyone else, and never discussed Lucio Celli's HIV+ status with Attorney Tand, or made any attempt to make a profit from his illness.
- 6) My husband is not under any investigation at Hunter College.
- 7) I never used my husband's account at Hunter College at any time.
- 8) My Second Amended Complaint was not filed frivolously.

If I missed something that Defendant Celli claims infers wrong-doing, lies, perjury, fraud, killing my mother, stealing, I deny any and all of his claims, which are baseless, frivolous and distracting to the gravamen of the matter before this Court.

I again implore the Court to seal Lucio Celli's papers and prohibit Defendant Lucio Celli from littering this proceeding with any more irrelevant and frivolous documents.

Thank you for your attention and consideration,



Elizabeth Betsy Combier

Plaintiff Pro Se

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315 EAST 65TH STREET  
APT 4C  
New York NY 10065  
US

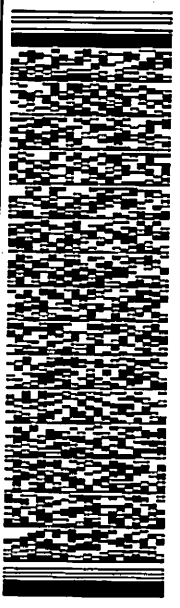
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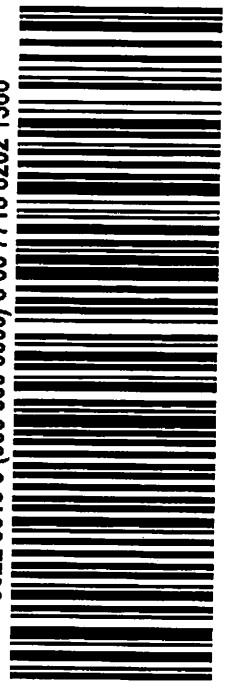
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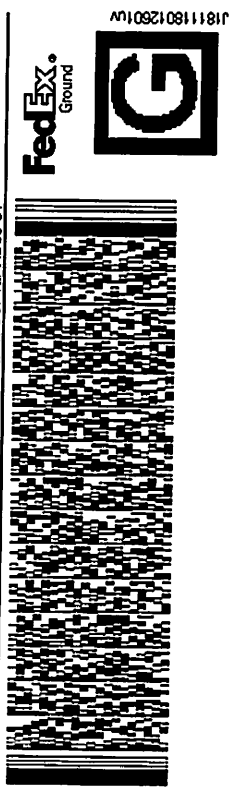
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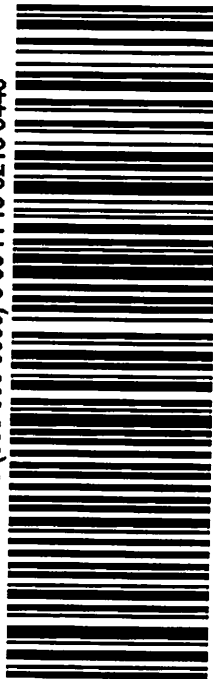
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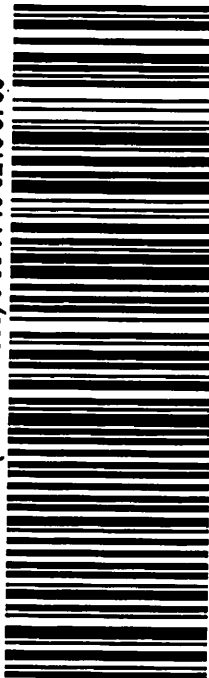
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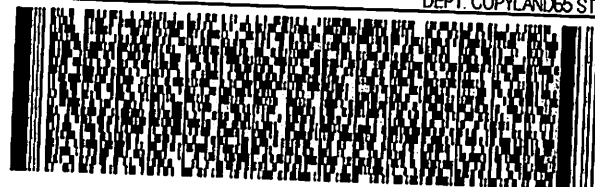
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